

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: WORLD TRADE CENTER
DISASTER SITE LITIGATION
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Docket No.: 21 MC 100 (AKH)

THIS DOCUMENT APPLIES TO ALL
WORLD TRADE CENTER DISASTER SITE
LITIGATION
-----X

DECLARATION IN FURTHER
RESPONSE TO AUGUST 17, 2010
ORDER AND ORAL DIRECTIVE
OF AUGUST 27, 2010

DENISE A. RUBIN an attorney duly licensed to practice before the courts of the State of New York and a member of the bar of this Honorable Court, hereby declares under penalty of perjury:

1. I am associated with the law firm Worby Groner Edelman & Napoli Bern, LLP, Plaintiffs' Co-Liaison Counsel in the above-captioned matters. This Declaration is made upon my personal knowledge and a review of the files maintained by the law firm for the prosecution of the plaintiffs' claims herein.

2. On August 26, 2010, this office submitted certain documents as Exhibits to my Declaration of that date. Those documents were each submitted in compliance with this Court's *sua sponte* Order dated August 17, 2010.

3. With the Court's prior permission, certain of those exhibits, specifically exhibits B-B4, inclusive; C-C4, inclusive; and F, were filed in redacted form, with full copies of each being submitted to this Court for *in camera* review only.

4. At the hearing held on August 27, 2010, this Court directed that certain portions of Exhibits B and C be filed with the Court's ECF system in non-redacted form. A copy of this Court's verbal direction to that effect is annexed here from the Transcript of the August 27, 2010 hearing (pp. 46-50).

5. The relevant transcript excerpt and the non-redacted exhibits are annexed to this Declaration. Specifically:

- a. Hearing Transcript August 27, 2010, pp. 46-50;
- b. Non-redacted Exhibit B – portions of WGENB retainer contract;
- c. Non-redacted Exhibit C – Template for Short-Form Client Settlement Letter.

Dated: New York, New York
September 1, 2010

A handwritten signature in black ink, appearing to read "Denise A. Rubin", written over a horizontal line.

Denise A. Rubin (DR5591)

ATTORNEY'S DECLARATION/AFFIRMATION OF SERVICE

Denise A. Rubin, an Attorney duly licensed to practice before the Courts of the State of New York, hereby affirms/declares the following under penalty of perjury:

I am associated with the law firm Worby Groner Edelman & Napoli Bern, LLP and as such represent the plaintiffs in the within action. On September 1, 2010, I duly served a true copy of the within Declaration of Denise A. Rubin with supporting Exhibits on the persons listed below by e-mail.

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Denise A. Rubin (DR5591)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: WORLD TRADE CENTER
DISASTER SITE LITIGATION

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21 MC 100 (AKH)
21 MC 102 (AKH)
21 MC 103 (AKH)

WORBY GRONER EDELMAN & NAPOLI BERN LLP'S SUBMISSION RESPONDING TO SUA
SPONTE ORDER OF AUGUST 17, 2010

WORBY GRONER EDELMAN & NAPOLI BERN, LLP

Co-Liaison Counsel for : Plaintiffs

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(212) 267-3700

The undersigned attorney hereby certifies, pursuant to Fed. R. Civ. P. 11 and 22 NYCRR §130-1.1-a, that I have read the within papers and that to the best of my knowledge and belief they are not frivolous as that term is defined in 22 NYCRR § 130-1.1(c) and Fed. R. Civ. P. 11.


Attorney name: Denise A. Kubin

PLEASE TAKE NOTICE:

☐ NOTICE OF ENTRY

that the within is a (certified) true copy of an _____ duly entered in the _____ office
of the clerk of the within named court on _____ 200__.

☐ NOTICE OF SETTLEMENT

that an order _____ of which the within is a true copy, will be
presented for settlement to the HON. _____ one of the judges of the
within named Court, at _____ on _____ 200__ at _____ O'clock ____ M.

Dated, _____

Yours, etc.

WORBY GRONER EDELMAN & NAPOLI BERN, LLP